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January 28, 2021

Via ECF

Hon. Laura Taylor Swain
United States District Court Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

MEMO ENDORSED

Re: United States v. Carlos Alvarez, 18-cr-656 (LTS)

Your Honor:

I am CJA counsel to Carlos Alvarez. I write, with no objection from the government, to request that the Court set a date for Mr. Alvarez's sentencing approximately 90-days from today.

After speaking with Mr. Alvarez, I have determined that the retention of a mitigation specialist is necessary to adequately and effectively represent him at his sentencing. Without a fulsome report on Mr. Alvarez's life and experiences, the Court will not have an accurate picture of the "history and characteristics" of the defendant, a fundamental and important aspect any sentencing proceeding. 18 U.S.C. Section 3553(a)(1). Unfortunately, it has taken several weeks to find an available mitigation specialist. We have now found one and are in the process of submitting the voucher to the Court.

Given the on-going COVID-19 pandemic, we believe 90 days is necessary, in part because in recent weeks the scheduling of telephones and video conferences with clients at the MDC has taken longer than usual.

Thus, we respectfully request the Court set a date for sentencing to occur in approximately 90 days. As noted, the government has no objection to this request.

I thank the Court for its attention to this matter.

The adjournment request is granted. The sentencing is adjourned to May 4, 2021, at 11:00 a.m. and the related deadlines are modified accordingly. DE# 163 resolved.

SO ORDERED.

1/28/2021

/s/ Laura Taylor Swain, USDJ

Respectfully submitted,

/s/

Dawn M. Cardi

cc: All Parties (via ECF)